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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOSEPH MORGAN, an individual,

Plaintiff,

v.

THE STATE OF NEVADA, *ex rel.* its
DEPARTMENT OF BUSINESS AND
INDUSTRY, STATE OF NEVADA *ex rel.*
its TAXICAB AUTHORITY; BRUCE
BRESLOW, in his individual capacity;
SCOTT WHITTEMORE, in his individual
capacity; RUBEN AQUINO, in his
individual capacity; GENEVIEVE
HUDSON, in her individual capacity;
RONALD GROGAN, in his individual
capacity; CHARLES HARVEY, in his
individual capacity; ANTOINE “CHRIS”
RIVERS, in his individual capacity; CJ
MANTHE, in her individual capacity; DOES
I through X inclusive; and ROES XI through
XX, inclusive,

Defendants.

Case No. 2:19-cv-02239-KKD-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE REPLY
IN SUPPORT OF MOTION FOR
SUMMARY JUDGMENT**

(FIRST REQUEST)

Pursuant to Local Rule IA 6-1, LR 7-2 and LR 26-3, Defendants, STATE OF NEVADA *ex rel.*
its DEPARTMENT OF BUSINESS AND INDUSTRY and TAXICAB AUTHORITY (together “the
State Agency Defendants”) and BRUCE BRESLOW, TERRY REYNOLDS, SCOTT WHITTEMORE,

1 RUBEN AQUINO, GENEVIEVE HUDSON, RONALD GROGAN, CHARLES HARVEY, ANTOINE
2 “CHRIS” RIVERS AND CARLA J. (CJ) MANTHE (each “Individual Defendant” and collectively the
3 “Individual Defendants” and together with the Agency Defendants “the Defendants”), by and through
4 their attorneys, AARON D. FORD, Attorney General for the State of Nevada, BRUCE C. YOUNG,
5 Senior Deputy Attorney General, and MATTHEW E. ESTRADA, Deputy Attorney General, and
6 Plaintiff JOSEPH MORGAN (“Plaintiff”), by and through his counsel of record, E. Brent Bryson, Esq.
7 of the Law Offices of E. Brent Bryson, LTD:

8 HEREBY STIPULATE AND REQUEST that this Court extend the deadline for Defendants to
9 file their Reply in Support of Motion for Summary Judgment, which is currently April 18, 2025 (see
10 (ECF No. 78), by 14 days or up to and including May 2, 2025. This is the first stipulated request for
11 extension of time requested by Defendants to file their Reply in Support of Motion for Summary
12 Judgment.

13 In support of this Stipulation, the parties state and agree that good cause exists for the extension
14 as follows:

- 15 1. Counsel for Defendants is currently preparing for an administrative hearing scheduled before
16 the Nevada State Personnel Commission in the matter of *Soto v. Nevada Department of*
17 *Corrections*, Appeal No. 2509497-GP, to be held on April 14, 2025; a hearing on a Petition
18 for Judicial Review in the matter of *Currier v. Nevada Department of Corrections*, Case No.
19 A-24-901354-J, Dept. VII, Eighth Judicial District Court, on April 15, 2025; counsel for
20 Defendants is scheduled to be out of town for personal family reasons on April 17th and 18th;
21 and counsel for Defendants is preparing for another administrative hearing scheduled before
22 the Nevada State Personnel Commission in the matter of *Tyler Harris v. Nevada Department*
23 *of Corrections*, Appeal No. 2507900-GP, to be held on April 29, 2025.
- 24 2. In addition, despite the fact that Plaintiff has agreed that dismissal of six of his claims is
25 appropriate on summary judgment, there are still seven (7) causes of action remaining that
26 must be addressed in the Reply.
- 27 3. As a result of these circumstances, counsel for the Parties met and conferred on April 10,
28 2025, and mutually agreed that it would be proper to extend the current deadline for

Defendants to file their Reply in Support of Motion for Summary Judgment in this matter of April 18, 2025 by 14 days, **or up to and including Friday, May 2, 2025**. It is anticipated that this brief extension will allow counsel for Defendants to properly prepare for and participate in the scheduled hearings, allow him to address his family matters out of state during this time frame, and prepare the Reply in this matter.

4. This Stipulation and request for extension is not sought for the purpose of delay or any other improper purpose.

WHEREFORE, the parties respectfully request that this Court extend Defendants' deadline to file its Reply in Support of Motion for Summary Judgment as set forth above.


APPROVED AS TO FORM AND CONTENT this 11th day of April, 2025.

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State of Nevada, et al.

IT IS SO ORDERED:

DATED this 14TH day of April, 2025.


KENT J. DAWSON
UNITED STATES DISTRICT JUDGE